

May 23, 2012

Docket No. MC2012-14

Docket No. R2012-8

Secretary
Postal Regulatory Commission
Washington, DC 20268-0001

Dear Secretary:

Founded in 1896 by Alden J. Blethen, The Seattle Times is a fourth and fifth generation family business. The family's flagship newspaper, The Seattle Times, is the largest daily newspaper in Washington state and the largest Sunday newspaper in the Pacific Northwest. It is the largest remaining independently held newspaper in the U.S. The flagship website, seattletimes.com, is the largest local news information website in the Northwest. Other Blethen-owned newspapers in Washington are the Walla Walla Union-Bulletin, the Yakima Herald-Republic, The Issaquah Press and its affiliated community newspapers: the Newcastle News, the Sammamish Review and the SnoValley Star.

The Seattle Times is a nine time winner of the Pulitzer Prize – and was recognized just this week in the Pulitzer ceremonies for outstanding Investigative Reporting. The series for which we were recognized in 2012 was titled “Methadone and the Politics of Pain” and told the story of Washington state's use of methadone for pain treatment in order to save money, and identified the medical evidence of preventable deaths caused by this practice. As a result of the series, the state immediately changed its practices resulting in the immediate saving of lives, particularly for those on Medicaid.

The work done by newspapers to tell such stories delivers real and critical societal benefits in every community throughout the U.S. This kind of investigative reporting is expensive and time consuming **and is made possible by advertising revenue**, driven significantly by advertising inserts for durable and semi-durable goods. Any threat to this revenue will directly result in undermining our ability to report on critical issues affecting our communities.

It is important to note that The Seattle Times has withstood a number of very significant challenges over the last decade. Against all odds, we have survived the challenges we have faced and are beginning to stabilize due to a great deal of effort on our part. Given the challenges we have overcome, the NSA proposal is particularly shocking in that it appears to be a proposed action by our quasi-governmental enterprise that would put us and other newspapers at a severe competitive disadvantage for important advertising revenue as we continue to navigate significant challenges. In addition to threatening our ability to fulfill our public service mission, the proposed NSA is a threat to jobs at The Seattle Times.

We recognize the objective of the USPS in proposing the NSA, especially given its own financial challenges, is to enhance its revenue in a manner that allows its continued functioning - also in an effort to serve the public. That said, the USPS' analysis of the financial impact of the NSA on the newspaper advertising market severely understates the impact. The USPS is only authorized to offer such deals to private enterprises if the deal will not cause undue harm in the marketplace. At very least, the Postal Service must conduct a more thorough review of the impact before proceeding.

For the reasons stated above, we urge the Commission to reject the proposed NSA.

Respectfully,



Alan Fisco
Senior Vice President, Sales and Marketing